

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CBV, INC.,)
)
Plaintiff,)
)
)
v.) C.A. No. 1:21-cv-01456-MN
)
CHANBOND, LLC,)
)
Defendant.)

**MOTION OF GREGORY COLLINS AND KAMAL MIAN TO
INTERVENE AND TO UNSEAL DOCUMENTS**

Gregory Collins and Kamal Mian (“Movants”) respectfully move the Court, pursuant to Federal Rule of Civil Procedure 24, to intervene for the limited purpose of challenging the sealing of judicial records in the above-referenced action.

Movants further respectfully move the Court to unseal documents filed under seal in the above-referenced action.

The factual and legal bases for these motions are set forth in Movant’s Opening Brief, filed contemporaneously herewith.

A proposed form of Order is attached.

Respectfully submitted,

/s/ David L. Finger

David L. Finger (DE Bar ID #2556)

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Collins and Kamal Mian

Dated: May 19, 2022

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CHANBOND, LLC,)
)
Defendant.)

**[PROPOSED] ORDER GRANTING THE MOTIONS OF GREGORY
COLLINS AND KAMAL MIAN (I) TO INTERVENE FOR THE LIMITED
PURPOSE OF CHALLENGING THE SEALING OF JUDICIAL RECORDS,
AND (II) TO UNSEAL DOCUMENTS**

On this ____ day of _____, 2022, having considered the submissions
and arguments of the parties, IT IS HEREBY ORDERED that:

1. Movants' Motion to Intervene for the Limited Purpose of Challenging
the Seal of Judicial Records is GRANTED.
2. Movants' Motion to Unseal Documents is GRANTED.
3. The Clerk of the Court is directed to remove immediately from under
seal and make public all documents that have been under seal accessible to the
public.

The Hon. Maryellen Noreika